

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC
PARTICIPATION, MARY WINTER, GENE
STEINBERG, NANCY HART, SARAH
WOLFF, KAREN SLAVEN, KATE KENNEDY,
EDA DANIEL, and ANDREA SFERES,

Plaintiff,

-and-

People of the STATE OF NEW YORK, by its
attorney general, LETITIA JAMES, ATTORNEY
GENERAL OF THE STATE OF NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN, J.M.
BURKMAN & ASSOCIATES, LLC, PROJECT
1599, and JOHN and JANE DOES 1-10,

Defendants.

Civil Action No. 20-cv-8668

**REPLY MEMORANDUM OF LAW IN SUPPORT OF
OF PLAINTIFFS' MOTION *IN LIMINE* TO EXCLUDE EVIDENCE OF PLAINTIFFS'
SETTLEMENT WITH THE MESSAGE DEFENDANTS**

Defendants did not file a memorandum of law in opposition to Plaintiffs' motion for an order to prohibit Defendants from introducing evidence concerning the liability of their settling co-Defendants Message Communications and Robert Mahanian or from making any mention of the settlement agreement, nor did they file a memorandum of law in support of their cross-motion to ensure Mahanian's attendance. *See* D.E. 304 (Notice of Defendants' Response and Cross Motion). Given Defendants have not provided any legal or factual arguments for Plaintiffs to address, Plaintiffs respectfully request the Court grant their motion. *See generally* D.E. 298.

Dated: New York, New York
July 14, 2023

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Respectfully submitted,

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